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Attorneys for Defendant  
SYDNEY DICKERSON

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII**

JANE DOE, Individually and as Next  
Friend of JOHN DOE, a minor;  
RICHARD ROE 1, Individually and  
on behalf of JANE ROE 1, a minor;  
RICHARD ROE 2 and MRS.  
RICHARD ROE 2, Individually and  
on behalf of JANE ROE 2, a minor;  
all Individually and on behalf of a  
class of persons similarly situated,

Plaintiffs,  
vs.

STATE OF HAWAII, SCOTT  
O'NEAL, SYDNEY DICKERSON,  
and JOHN DOES 1-10,

Defendants.

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STATE OF HAWAII

Third-Party Plaintiff,  
vs.

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CIVIL NO. 11-00550 DAE KSC  
(Other Non-Vehicle Tort)

**INITIAL DISCLOSURES OF  
SYDNEY DICKERSON  
IN HER PERSONAL CAPACITY;  
CERTIFICATE OF SERVICE**

Trial Date: 10/23/2012 @ 9:00 am

PETER POES 1-100, PATRICIA  
POES 1-100, AND PARENT POES  
1-100,

Third-Party Defendants.

SCOTT O'NEAL,

Cross-Claimant,  
vs.

STATE OF HAWAI'I AND  
SYDNEY DICKERSON,  
Cross Claim Defendants.

**INITIAL DISCLOSURES OF SYDNEY DICKERSON  
IN HER PERSONAL CAPACITY**

SYDNEY DICKERSON, in her individual capacity (hereinafter Ms. Dickerson), by her attorneys, David M. Louie, Attorney General of Hawaii, Deborah Day Emerson, C. Bryan Fitzgerald, Deputy Attorneys General, pursuant to Rule 26(a)(1), Federal Rules of Civil Procedure, hereby submit Initial Disclosures.

**I. PERSONS WITH PERSONAL KNOWLEDGE**

Ms. Dickerson identifies the following persons who may have knowledge of discoverable information on liability and/or damages that may be used by the parties in support of their claims or defenses. Some of the information held by such persons may be privileged, which will have to be determined through further investigations and discovery.

1. All other parties to this action, including DOES, ROES, POES and their parents and/or guardians as is applicable.

Contact through their respective counsel of record.

2. Harry Hayler

c/o Department of the Attorney General  
425 Queen Street  
Honolulu, Hawaii 96813  
Telephone: 586-1300

3. Inga Park-Okuna

c/o Department of the Attorney General  
425 Queen Street  
Honolulu, Hawaii 96813  
Telephone: 586-1300

4. Danielle Thompson

c/o Department of the Attorney General  
425 Queen Street  
Honolulu, Hawaii 96813  
Telephone: 586-1300

5. Steve Laracuenta

c/o Department of the Attorney General  
425 Queen Street  
Honolulu, Hawaii 96813  
Telephone: 586-1300

6. Patricia Hamamoto

c/o Department of the Attorney General  
425 Queen Street  
Honolulu, Hawaii 96813  
Telephone: 586-1300

7. Persons identified only as “RINGLEADERS” by the Plaintiff.

c/o MICHAEL JAY GREEN  
841 Bishop Street, Suite 2201  
Honolulu, Hawaii 96813  
Telephone: (808) 521-3336  
Fax: (808) 566-0347

8. All individuals listed in any other parties’ initial disclosures.
9. Ms. Dickerson reserve the right to supplement/amend its Initial Disclosures as deemed necessary, based upon further investigation and discovery.
10. Ms. Dickerson reserves the right to identify other persons who may have knowledge of discoverable information relevant to the claims and the defenses.

## II. DOCUMENTS, DATA COMPILATIONS, TANGIBLE THINGS

Pursuant to Rule 26(a)(1)(B), Ms. Dickerson will provide access to documents, including the following description by category of documents and tangible things, to the extent not privileged, to Plaintiffs’ counsel for inspection and/or copying at a mutually convenient time and place. Currently, there are no documents, data compilations or tangible things in the possession, custody or control of Ms. Dickerson, individually, that may be used to support his defenses in this case.

### III. DAMAGES

At this time, the Ms. Dickerson has yet to cross or counter claim in this matter.

### IV. INSURANCE

Ms. Dickerson is unaware of any insurance coverage other than that which may be available by way of the potential vicarious liability of the State.

DATED: Honolulu, Hawai'i, November 14, 2011.

DAVID M. LOUIE  
Attorney General of Hawai'i

/s/ C. Bryan Fitzgerald  
C. BRYAN FITZGERALD  
Deputy Attorney General

Attorneys for Defendant  
SYDNEY DICKERSON,  
In Her Individual Capacity

**IN THE UNITED STATES DISTRICT COURT  
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Friend of JOHN DOE, a minor;  
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STATE OF HAWAII

Third-Party Plaintiff,  
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PETER POES 1-100, PATRICIA  
POES 1-100, AND PARENT POES  
1-100,

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SCOTT O'NEAL,

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CIVIL NO. 11-00550 DAE KSC  
(Other Non-Vehicle Tort)

**CERTIFICATE OF SERVICE  
(INITIAL DISCLOSURES OF  
SYDNEY DICKERSON IN HER  
PERSONAL CAPACITY)**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the undersigned date a copy of the above stated motion was served by first-class United States mail or electronically via CM/ECF, to the following parties at their last known address:

MICHAEL J. GREEN, Esq.  
Davies Pacific Ctr.  
841 Bishop St., Ste. 2201  
Honolulu, Hawaii 96813  
Attorney for Plaintiffs

JOHN MOLAY  
Deputy Attorneys General  
Department of the Attorney  
General, State of Hawaii  
425 Queen Street  
Honolulu, Hawaii 96813  
Attorneys for Defendant STATE OF HAWAII

RANDALL K. SCHMITT, Esq.  
JORDON J. KIMURA, Esq.  
500 Ala Moana Boulevard  
Five Waterfront Plaza, 4th Floor  
Honolulu, Hawai'i 96813  
Attorneys for Defendant Scott O'Neal

DATED: Honolulu, Hawai'i, November 14, 2011.

/s/ C. Bryan Fitzgerald  
C. BRYAN FITZGERALD  
Deputy Attorney General